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BEFORE THE ARIZONA CORPORATION COMMISSION

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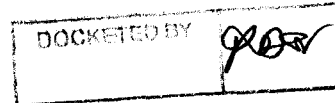
SANDRA D. KENNEDY  
Commissioner

BOB STUMP  
Commissioner

Arizona Corporation Commission  
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BRENDA BURNS  
Commissioner

JAN 28 2011



IN THE MATTER OF THE APPLICATION OF  
GILA BEND POWER PARTNERS, L.L.C.  
AND ITS ASSIGNEES IN CONFORMANCE  
WITH THE REQUIREMENTS OF ARIZONA  
REVISED STATUTES SECTIONS 40-360.03  
AND 40-360.06 FOR A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY  
AUTHORIZING CONSTRUCTION OF ONE  
500KV TRANSMISSION LINE AND  
ASSOCIATED SWITCHYARD  
COMPONENTS IN MARICOPA COUNTY,  
ARIZONA ORIGINATING AT THE  
HASSAYAMPA SWITCHYARD NEAR THE  
PALO VERDE NUCLEAR GENERATING  
STATION WEST OF PHOENIX, ARIZONA  
(SECTION 15, TOWNSHIP 1 SOUTH,  
RANGE 6 WEST, G&SRB&M) AND  
TERMINATING AT THE JOJOBA  
SWITCHYARD (SECTION 25, TOWNSHIP 2  
SOUTH, RANGE 4 WEST) A DISTANCE OF  
APPROXIMATELY 20 MILES

DOCKET NO. L-00000V-02-0119

CASE NO. 119

**COMMENT ON STAFF'S  
PROPOSED ORDER**

Gila Bend Power Partners, L.L.C. ("GBPP") respectfully submits the following  
comment on Staff's Proposed Order filed in this docket on January 19, 2011.

In its Proposed Order and accompanying Open Meeting Memorandum, Staff  
recommends extending GBPP's CEC for the requested seven years but adding a condition  
that GBPP may request further extensions "provided that the subject GBPP facilities have

1 been substantially constructed as of the time of such extension request.” In discussions  
2 with Staff, GBPP learned that this language was added to two recently extended CECs in  
3 other dockets.<sup>1</sup> In both of those cases, the extensions were requested and granted for ten  
4 years. GBPP does not oppose Staff’s recommended condition but requests that its CEC in  
5 this matter also be extended for ten years, rather than seven years as initially requested.  
6 Since the “substantially constructed” condition is more restrictive than the current  
7 condition regarding the CEC’s term, a ten year extension is more appropriate, as in the two  
8 prior cases where the Commission granted ten year extensions.

9 This same comment is being made to Staff’s Proposed Orders in Line Siting Cases  
10 Nos. 106 and 109 (Dockets Nos. L-00000V-00-0106 and L-00000V-00-0109).

11 RESPECTFULLY SUBMITTED this 28<sup>th</sup> day of January, 2011.

12 LEWIS AND ROCA

13 

14 Thomas H. Campbell  
15 Matthew G. Bingham  
16 40 N. Central Avenue  
17 Phoenix, Arizona 85004

18 Attorneys for Gila Bend Power Partners, L.L.C.

19 ORIGINAL and thirteen (13) copies were  
20 filed this 28<sup>th</sup> day of January, 2011, with:

21 Arizona Corporation Commission  
22 Hearing Division – Docket Control  
23 1200 West Washington Street  
24 Phoenix, Arizona 85007

25 <sup>1</sup> See Decision No. 71951 (Nov. 1, 2010), Docket No. L-00000BB-01-0118 (regarding  
26 extension of CEC for Bowie Power Station); and Decision No. 72007 (Dec. 10, 2010),  
Docket No. L-00000U-00-0103-00000 (regarding extension of CEC for Diné Power  
Authority’s 500kV Transmission Line).

1 COPY of the foregoing was hand-delivered  
2 this 28<sup>th</sup> day of January, 2011, to:

3 Lynn Farmer, Chief Administrative Law Judge  
4 Hearing Division  
5 Arizona Corporation Commission  
6 1200 W. Washington Street  
7 Phoenix, Arizona 85007

8 Steven Olea, Director  
9 Utilities Division  
10 Arizona Corporation Commission  
11 1200 W. Washington Street  
12 Phoenix, Arizona 85007

13 Janice Alward, Chief Counsel  
14 Legal Division  
15 Arizona Corporation Commission  
16 1200 W. Washington Street  
17 Phoenix, Arizona 85007

18 COPY of the foregoing was mailed  
19 this 28<sup>th</sup> day of January, 2011, to:

20 Kenneth Sundlof  
21 Jennings, Strouss & Salmon, P.L.C.  
22 The Collier Center, 11<sup>th</sup> Floor  
23 201 E. Washington Street  
24 Phoenix, Arizona 85004-2385

25 John J. Foreman  
26 PAD/CPA  
Office of the Attorney General  
1275 West Washington Street  
Phoenix, Arizona 85007

